

San Francisco Police Department
Custodian of Records
1245 3rd Street
San Francisco CA 94158
michael.andraychak@sfgov.org
sent via email

Our ref.
#20192334

Date
2019-09-11

RE: Adachi Communications Audit – Immediate Disclosure Request

To Whom It May Concern:

** NOTE: Please redact all responses correctly! This is a public mailbox, and all of your responses (including disclosed records) may be automatically and instantly available to the general public on the MuckRock.com service used to issue this request (though I am not a MuckRock representative). Once you send them to us, there is no going back. **

We request under the San Francisco Sunshine Ordinance (Ordinance) and the California Public Records Act (CPRA) the below records from each of the SFPD and the Police Commission. Parts A and B are an immediate disclosure request, the rest are regular timeline.

Please send all of your replies to both the address you received this request from and also please 'BCC' the following address: arecords.requestor+aca20192334@protonmail.com. I will not use any third-party records website - please just email all records.

We remind you of your obligations to provide electronic records in any format we request them in, if that format is the original format, available to you, OR easily generated. Therefore, e-mails exported in the .eml or .msg format with all non-exempt headers, metadata, attachments, images, etc. are best. However, if you choose (against our wishes) to convert emails, for example, to PDF or printed format, to easily redact them, you must ensure that you have preserved the full content (hyperlinks, formatting, images, attachments, etc.) of the original email record, which also contains many detailed headers beyond the generally used From/To/Subject/Sent/etc. For the chat apps, a screenshot or print-out is acceptable, but it must retain all attachments, timestamps, images, etc which must be provided separately if screenshots cannot capture that info.

Original records are generally in color - do not convert them to black and white and thus destroy informa-

tion.

As used below "communications" include but are not limited to any metadata records showing that a conversation had taken place but is now deleted (due to expiration for example). "Sent" and "received" include every form of communication or transmissions - including but not limited to "to," "from," "cc," "bcc," mailing lists, etc. and also include posting or receiving messages in social media (like tweets or wall posts). "Account" refers to *every* account, not just a primary or public-facing account.

If you use PDF, you must use text pdfs (which are easily generated). Please don't use image/scanned PDFs to make it harder to analyze the records. If you provide PDFs instead of original email files, only give a few of the headers or lacking attachments/images, and/or improperly withhold public records that exist on private accounts/devices you may be in violation of SF Admin Code and/or CPRA, and we may challenge your decision at the Sunshine Ordinance Task Force, Supervisor of Records, judicially, and/or via any other remedies available to us. I currently have pending petitions to the Task Force and Supervisor of Records to correct prior disclosure failures of electronic information from your and other SF agencies.

You must justify all withholding. Please ensure your justification is tied specifically to each and every redaction, not a general redaction. If you withhold or redact records, do not destroy the originals - I intend to petition the Sup. of Records, SOTF, and/or Superior Court for all withholdings/redactions.

Provide records in a rolling fashion. Do not wait for all records to be available.

Please provide only those copies of records available without any fees. If you determine certain records would require fees, please instead provide the required free notice of which of those records are available and non-exempt for inspection in-person if we so choose. Please use email to respond.

Keywords provided should be searched in all parts of the record: subject, body, to/from/etc., headers, metadata, attachments, and so on.

I expect a determination of "no responsive records," "all records disclosed," "all records withheld" (with justification), or "some records disclosed, some withheld" (with justification) for each and every individual request of the 300 total requests made below.

I look forward to your prompt disclosure.

A. IMMEDIATE DISCLOSURE REQUEST: an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, events, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED GOVT EMAIL OR CALENDAR ACCOUNTS, containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
4. Deputy Chief/Administration
5. Executive Director/Strategic Management
6. Deputy Chief/Field Operations
7. Deputy Chief/Investigations
8. Deputy Chief/Special Operations
9. Deputy Chief/Airport

10. every Commander
11. every Civilian Director
12. all officers involved in the raid on Carmody
13. all employees/members of the SFPD or Police Commission not specifically listed above
14. the SFPD/Police Commission as a whole (i.e. accounts not belonging to any one employee, but generally used by the agency)

B. IMMEDIATE DISCLOSURE REQUEST: an electronic copy (i.e. scan if only physical copies exist), in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all memoranda, notebooks, papers, orders, warrants, arrest reports, evidence inventories, notes, post-its, court orders, subpoenas, mailings, invoices and other writing of the following, containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" created between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
4. Deputy Chief/Administration
5. Executive Director/Strategic Management
6. Deputy Chief/Field Operations
7. Deputy Chief/Investigations
8. Deputy Chief/Special Operations
9. Deputy Chief/Airport
10. every Commander
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12. all officers involved in the raid on Carmody
13. all employees/members of the SFPD or Police Commission not specifically listed above
14. the SFPD/Police Commission as a whole (i.e. accounts not belonging to any one employee, but generally used by the agency)

C. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [Facebook Messenger], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
4. Deputy Chief/Administration
5. Executive Director/Strategic Management
6. Deputy Chief/Field Operations
7. Deputy Chief/Investigations
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13. all employees/members of the SFPD or Police Commission not specifically listed above
14. the SFPD/Police Commission as a whole (i.e. accounts not belonging to any one employee, but generally used by the agency)

D. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED accounts in [Telegram], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
4. Deputy Chief/Administration
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E. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [Facebook (i.e. Facebook pages, posts, etc.)], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
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7. Deputy Chief/Investigations
8. Deputy Chief/Special Operations
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F. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [Slack], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
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G. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [Google Hangouts], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
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H. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [Signal], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
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I. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [SMS/MMS/text/chat messages, using any app not explicitly mentioned in this request], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
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6. Deputy Chief/Field Operations
7. Deputy Chief/Investigations
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J. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [WhatsApp], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
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6. Deputy Chief/Field Operations
7. Deputy Chief/Investigations
8. Deputy Chief/Special Operations
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K. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [Instagram], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
4. Deputy Chief/Administration
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7. Deputy Chief/Investigations
8. Deputy Chief/Special Operations
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14. the SFPD/Police Commission as a whole (i.e. accounts not belonging to any one employee, but generally used by the agency)

L. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [WeChat], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
4. Deputy Chief/Administration
5. Executive Director/Strategic Management
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M. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [Skype], containing any of the following (case insensitive): "adachi" OR "public

defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
4. Deputy Chief/Administration
5. Executive Director/Strategic Management
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N. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [Twitter], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
4. Deputy Chief/Administration
5. Executive Director/Strategic Management
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14. the SFPD/Police Commission as a whole (i.e. accounts not belonging to any one employee, but generally used by the agency)

O. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [iMessage/Face-Time], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
4. Deputy Chief/Administration
5. Executive Director/Strategic Management

6. Deputy Chief/Field Operations
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14. the SFPD/Police Commission as a whole (i.e. accounts not belonging to any one employee, but generally used by the agency)

AA. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL email account (per City of San Jose v Superior Court (2017)), containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
4. Deputy Chief/Administration
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10. every Commander
11. every Civilian Director
12. all officers involved in the raid on Carmody
13. all employees/members of the SFPD or Police Commission not specifically listed above
14. the SFPD/Police Commission as a whole (i.e. accounts not belonging to any one employee, but generally used by the agency)

BB. an electronic copy (or scan if only physical copies exist), in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all personal (per City of San Jose v Superior Court (2017)) memoranda, notebooks, papers, orders, note, post-its, and other writing of the following, containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" created between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
4. Deputy Chief/Administration
5. Executive Director/Strategic Management
6. Deputy Chief/Field Operations
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12. all officers involved in the raid on Carmody
13. all employees/members of the SFPD or Police Commission not specifically listed above
14. the SFPD/Police Commission as a whole (i.e. accounts not belonging to any one employee, but generally used by the agency)

CC. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [Facebook Messenger], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
4. Deputy Chief/Administration
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13. all employees/members of the SFPD or Police Commission not specifically listed above
14. the SFPD/Police Commission as a whole (i.e. accounts not belonging to any one employee, but generally used by the agency)

DD. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [Telegram], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
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14. the SFPD/Police Commission as a whole (i.e. accounts not belonging to any one employee, but generally used by the agency)

EE. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [Facebook (i.e. Facebook pages, posts, etc.)], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
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14. the SFPD/Police Commission as a whole (i.e. accounts not belonging to any one employee, but generally used by the agency)

FF. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [Slack], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
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GG. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [Google Hangouts], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News"

between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
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HH. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [Signal], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
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II. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [SMS/MMS/text/chat messages, using any app not explicitly mentioned in this request], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

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13. all employees/members of the SFPD or Police Commission not specifically listed above
14. the SFPD/Police Commission as a whole (i.e. accounts not belonging to any one employee, but generally used by the agency)

JJ. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [WhatsApp], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Chief of Police
2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
4. Deputy Chief/Administration
5. Executive Director/Strategic Management
6. Deputy Chief/Field Operations
7. Deputy Chief/Investigations
8. Deputy Chief/Special Operations
9. Deputy Chief/Airport
10. every Commander
11. every Civilian Director
12. all officers involved in the raid on Carmody
13. all employees/members of the SFPD or Police Commission not specifically listed above
14. the SFPD/Police Commission as a whole (i.e. accounts not belonging to any one employee, but generally used by the agency)

KK. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [Instagram], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

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2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
4. Deputy Chief/Administration
5. Executive Director/Strategic Management
6. Deputy Chief/Field Operations
7. Deputy Chief/Investigations
8. Deputy Chief/Special Operations

9. Deputy Chief/Airport
10. every Commander
11. every Civilian Director
12. all officers involved in the raid on Carmody
13. all employees/members of the SFPD or Police Commission not specifically listed above
14. the SFPD/Police Commission as a whole (i.e. accounts not belonging to any one employee, but generally used by the agency)

LL. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [WeChat], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

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2. Asst. Chief/Chief of Staff
3. Asst. Chief/Operations
4. Deputy Chief/Administration
5. Executive Director/Strategic Management
6. Deputy Chief/Field Operations
7. Deputy Chief/Investigations
8. Deputy Chief/Special Operations
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10. every Commander
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12. all officers involved in the raid on Carmody
13. all employees/members of the SFPD or Police Commission not specifically listed above
14. the SFPD/Police Commission as a whole (i.e. accounts not belonging to any one employee, but generally used by the agency)

MM. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [Skype], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

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5. Executive Director/Strategic Management
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7. Deputy Chief/Investigations
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12. all officers involved in the raid on Carmody
13. all employees/members of the SFPD or Police Commission not specifically listed above

14. the SFPD/Police Commission as a whole (i.e. accounts not belonging to any one employee, but generally used by the agency)

NN. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [Twitter], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

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OO. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [iMessage/Face-Time], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

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2. Asst. Chief/Chief of Staff
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